

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

DEBORAH CHIN, individually and on behalf of all others similarly situated, )  
v. )  
Plaintiff, )  
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN NILL, )  
Defendants. )  
MICHELLE TREBITSCH, on behalf of herself and all others similarly situated, )  
v. )  
Plaintiff, )  
SONUS NETWORKS, INC., HASSAN M. AHMED, and STEPHEN J. NILL, )  
Defendants. )

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Civil Action No. 1:04-CV-10294 (DPW)  
Civil Action No. 1:04-CV-10307 (DPW)

[Captions continued on next page]

**NOTICE OF MOTION TO CONSOLIDATE ACTIONS,  
TO BE APPOINTED LEAD PLAINTIFFS AND FOR APPROVAL OF LEAD  
PLAINTIFFS' SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

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INFORMATION DYNAMICS LLC, on )  
behalf of itself and all others similarly )  
situated, )  
 )  
 Plaintiff, )  
 ) Civil Action No. 1:04-CV-10308 (DPW)  
 v. )  
 )  
 SONUS NETWORKS, INC., PAUL R. )  
 JONES, EDWARD N. HARRIS, J. )  
 MICHAEL O'HARA, HASSAN M. )  
 AHMED, and STEPHEN J. NILL, )  
 )  
 Defendants. )

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PETER KALTMAN, on behalf of himself )  
 and all others similarly situated, )  
 )  
 Plaintiff, )  
 )  
 v. ) Civil Action No. 1:04-CV-10309 (DPW)  
 )  
 SONUS NETWORKS, INC., RUBIN )  
 GRUBER, HASSAN AHMED, and )  
 STEPHEN NILL, )  
 )  
 Defendants. )

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SAMANTHA DEN, individually and on )  
 behalf of all others similarly situated, )  
 )  
 Plaintiff, )  
 )  
 v. ) Civil Action No. 1:04-CV-10310 (DPW)  
 )  
 SONUS NETWORKS, INC., HASSAN M. )  
 AHMED, and STEPHEN J. NILL, )  
 )  
 Defendants. )

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RICHARD CURTIS, individually and on behalf of all others similarly situated, )  
v. )  
Plaintiff, )  
SONUS NETWORKS, INC., HASSAN M. )  
AHMED, and STEPHEN J. NILL, )  
Defendants. )  
RONALD KASSOVER, on behalf of the )  
Ronald Kassover IRA and on behalf of all )  
others similarly situated, )  
v. )  
Plaintiff, )  
SONUS NETWORKS, INC., HASSAN M. )  
AHMED, and STEPHEN J. NILL, )  
Defendants. )  
STEVE L. BAKER, individually and on behalf of all others similarly situated, )  
v. )  
Plaintiff, )  
SONUS NETWORKS, INC., HASSAN M. )  
AHMED, and STEPHEN NILL, )  
Defendants. )  
Civil Action No. 1:04-CV-10314 (MLW)  
Civil Action No. 1:04-CV-10329 (DPW)  
Civil Action No. 1:04-CV-10333 (DPW)

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MICHAEL KAFFEE, individually and on behalf of all others similarly situated, )  
Plaintiff, )  
v. ) Civil Action No. 1:04-CV-10345 (DPW)  
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN NILL, )  
Defendants. )

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HAIMING HU, individually and on behalf of all others similarly situated, )  
Plaintiff, )  
v. ) Civil Action No. 1:04-CV-10346 (DPW)  
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN NILL, )  
Defendants. )

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CHARLES STARBUCK, individually and on behalf of all others similarly situated, )  
Plaintiff, )  
v. ) Civil Action No. 1:04-CV-10362 (DPW)  
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN NILL, )  
Defendants. )

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SANUEL HO, individually and on behalf of all others similarly situated, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN NILL, Defendants. ) Plaintiff, ) v. ) Defendants. ) ) Civil Action No. 1:04-CV-10363 (DPW)

JEFFREY C. RODRIGUES, individually and on behalf of all others similarly situated, v. SONUS NETWORKS, INC., HASSAN M. AHMED, and STEPHEN J. NILL, Defendants. ) Plaintiff, ) v. ) Defendants. ) ) Civil Action No. 1:04-CV-10364 (DPW)

ROBERT CONTE and MARK RESPLER, individually and on behalf of all others similarly situated, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN NILL, Defendants. ) Plaintiff, ) v. ) Defendants. ) ) Civil Action No. 1:04-CV-10382 (DPW)

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WHEATON ELECTRICAL SERVICES )  
RETIREMENT 401K PROFIT SHARING )  
PLAN, on behalf of itself and all others )  
similarly situated, )  
 )  
 Plaintiff, ) Civil Action No. 1:04-CV-10383 (DPW)  
 )  
 v. )  
 )  
 SONUS NETWORKS, INC., HASSAN )  
 AHMED, and STEPHEN NILL, )  
 )  
 Defendants. )

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BRIAN CLARK, individually and on )  
behalf of all others similarly situated, )  
 )  
 Plaintiff, )  
 )  
 v. ) Civil Action No. 1:04-CV-10454 (DPW)  
 )  
 SONUS NETWORKS, INC., PAUL R. )  
 JONES, EDWARD N. HARRIS, J. )  
 MICHAEL O'HARA, HASSAN M. )  
 AHMED, and STEPHEN J. NILL, )  
 )  
 Defendants. )

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SHEILA BROWNWELL, individually and )  
on behalf of all others similarly situated, )  
 )  
 Plaintiff, )  
 )  
 v. ) Civil Action No. 1:04-CV-10597 (DPW)  
 )  
 SONUS NETWORKS, INC., HASSAN )  
 AHMED, and STEPHEN NILL, )  
 )  
 Defendants. )

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PLEASE TAKE NOTICE that class members Nakid M. Farhat, Kenneth W. McGaha, John Haggins and Patrick Fung (collectively, the “Farhat Plaintiff Group”), by their counsel, will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) appointing the Farhat Plaintiff Group as lead plaintiffs; (ii) approving the Farhat Plaintiff Group’s selection of the law firms of Schiffrian & Barroway, LLP and Goodkind Labaton Rudoff & Sucharow, LLP to serve as lead counsel; (iii) approving the Farhat Plaintiff Group’s selection of the law firm of Shapiro Haber & Urmy, LLP to serve as liaison counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this motion, the Farhat Plaintiff Group submits herewith a memorandum of law and declaration of Darren J. Check.

Dated: April 12, 2004.

Respectfully submitted,

**SHAPIRO HABER & URMY, LLP**

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